

BUCHANAN INGERSOLL & ROONEY PC
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOBBY L. HUGHLEY JR.,

CASE NO.:

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS, INC.;
EQUIFAX INFORMATION SERVICES, LLC;
TRANSUNION, LLC;
NELNET, INC.;
KICKOFF LENDING, LLC,

Defendants.

TRANSUNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant TransUnion, LLC (“TransUnion”) hereby removes the subject action from the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York on the following grounds:

1. Plaintiff Bobby L. Hughley Jr. (“Hughley”) is a natural person who resides in New York.
2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.

NATURE OF CASE

3. On August 26, 2024, Hughley commenced this action in the Supreme Court of the State of New York, County of New York, entitled *Bobby L. Hughley Jr. v. Experian Information Solutions, Inc., et al.*, Index Number 101034/2024 via a Summons and Complaint. A true and correct copy of the Summons and Complaint is attached hereto as **Exhibit A**.

4. On December 31, 2024, Hughley served TransUnion with the Summons and Complaint. *See* Ex. A. No other process, pleadings, or orders have been served on TransUnion.

5. TransUnion filed an Answer with Affirmative Defenses to Hughley's Complaint on January 21, 2025.

6. Hughley makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). *See* Ex. A.

7. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 because there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

8. Pursuant to 28 U.S.C. § 1441 *et seq.*, this cause may be removed from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York.

9. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion's receipt of a copy of the Summons and Complaint, filed in the Supreme Court of the State of New York, County of New York, Index Number 101034/2024.

10. Attached hereto as **Exhibit B** is a copy of TransUnion's Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of New York, Index Number 101034/2024.

11. Defendants Experian Information Solutions, Inc., Equifax Information Services, LLC, Nelnet, Inc.,¹ and Kikoff Lending, LLC (incorrectly captioned as Kickoff Lending, LLC) have consented to removal, by counsel. Attached collectively hereto as **Exhibit C** are copies of the consent forms.

12. Notice of this Removal will be promptly filed in the Supreme Court of the State of New York, County of New York, Index Number 101034/2024, and served upon all parties.

WHEREFORE, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of New York to this United States District Court, Southern District of New York.

Date: January 29, 2025

BUCHANAN INGERSOLL & ROONEY PC

/s/ Andrew G. Hope

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¹ Nelnet, Inc. has not been served with the Summons and Complaint in this proceeding.